

# NOTICE OF PRIVACY PRACTICES

## Longevity Metrics, Inc.

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**Version V3 | Effective Date: August 8, 2026**

**THIS NOTICE DESCRIBES HOW MEDICAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

Longevity Metrics, Inc. is required by law to maintain the privacy of your protected health information, to notify you of our legal duties and privacy practices, and to notify you if a breach of your unsecured protected health information occurs. This Notice summarizes our duties and your rights under 45 C.F.R. Part 164. We are required to abide by the terms of the Notice currently in effect.

This Notice applies to all protected health information collected through our Human Performance Lab, Health Ahead Bus mobile screening unit, the online environmental health screener at [humanobservatory.org](https://humanobservatory.org), and any research activities conducted under the Longevity Metrics Ethics Board (Longevity Metrics IRB #1; OHRP Registration IORG0012336 / IRB00014601), reachable independently at [ethics@longevitymetrics.org](mailto:ethics@longevitymetrics.org), which goes to the Chair of the Ethics Board and does not pass through the Principal Investigator or the study team.

## 1. Uses and Disclosures We May Make Without Written Authorization

### Treatment

We may use or disclose your health information to provide, coordinate, or manage your care and related services. This includes sharing information with other healthcare providers involved in your treatment, providing appointment reminders, and sharing information about treatment alternatives or other health-related services we offer.

### Payment

Unless you instruct us otherwise and have paid for services in full, we may use or disclose your health information to obtain payment for services provided to you.

### Healthcare Operations

We may use or disclose your health information for activities necessary to operate our practice and ensure quality care, including staff performance review, quality assessment, training, and business management activities.

### Research

Longevity Metrics, Inc. operates a unified research program governed by our OHRP-registered Ethics Board (Institutional Review Board, IORG0012336 / IRB00014601). The current studies are the 100-Year Human Aging Study, the Human Observatory

Study, the Health Ahead Comparative Effectiveness Study, and the Longevity Metrics AI/ML Development Study; additional studies may be added by IRB-approved amendment under the same unified consent framework. We may use or disclose your protected health information for research purposes when: (a) the Ethics Board has reviewed and approved the research and waived or modified the authorization requirement; (b) you have provided written authorization for the specific research use; or (c) the information has been de-identified in accordance with HIPAA standards.

Research data collected through our clinical screening protocol — including but not limited to cardiopulmonary exercise testing, body composition, sleep study, cardiac imaging, laboratory diagnostics, and neurocognitive assessments — may be used in approved research studies. You will be informed of specific research activities at enrollment and asked to sign a separate informed consent document. In-person participants receive the Consent for Patient Care V3, the Clinical Research Consent Form V3, this Notice, and the Unified Patient Agreement V3. Online-only participants receive the Clinical Research Consent Form V3, this Notice, and an online participation agreement page; the Consent for Patient Care is presented only on conversion to in-person screening.

Enrollment in our IRB-approved research is a condition of receiving in-person screening services at Longevity Metrics. Participation nonetheless remains voluntary: you may decline to become a patient, you may decline any individual test or procedure at any time, and you may withdraw from research at any time without penalty and without affecting clinical services you have already paid for. Individuals who do not wish to participate in research may seek health screening services elsewhere.

### **Mortality Follow-Up and Death Record Access**

As part of the 100-Year Human Aging Study, Longevity Metrics, Inc. collects lifetime consent from research participants to access death records from state vital statistics, the National Death Index, the Social Security Death Master File, and other public mortality databases after a participant's death. This access is used to validate longevity predictions made at the time of enrollment and to improve our research models over time. Participants authorize this access at enrollment in every pathway, in person and online, and it is not optional; the authorization survives any other withdrawal from research participation. Social Security Numbers collected for this purpose are stored encrypted, with access restricted to authorized personnel, and used only for mortality record linkage and identity verification on a records request. A Social Security Number is required for in-person testing from participants who have one. Provision is optional for online-only participants and determines only the precision with which a record can be matched; each record carries the linkage tier that applies to it.

### **Healthcare Data Sharing Networks**

With your written authorization, we may link your health information to records from other healthcare providers through healthcare data sharing networks. This

linkage authorization is collected separately and is always optional. You may decline linkage to healthcare data sharing networks without affecting your participation in clinical services or research.

### **Online Screener and humanobservatory.org**

Information you provide through the free environmental and lifestyle screener at humanobservatory.org is subject to this Notice. If you consent during the screener process, your responses may be linked to your clinical record and used for research purposes under our Ethics Board-approved protocol. Your geographic and environmental data may be used to generate population-level health intelligence in de-identified form.

### **De-identified Data and Research Partnerships**

We may share data that has been de-identified in accordance with HIPAA Safe Harbor standards (removal of all 18 specified identifiers) with academic researchers, public health institutions, and scientific collaborators under formal data use agreements. We also develop models, risk estimates, and analytic findings from research data and may provide these to employers, insurers, government agencies, and other organizations, or otherwise use them commercially; what is provided is the intelligence derived from the data, never a patient record and never a dataset containing patient data. De-identified data is not protected health information under HIPAA. We maintain a record of all de-identified data sharing agreements. Identifiable protected health information is held on Longevity Metrics on-premises systems and with established cloud service providers under business associate agreements that bind those providers under HIPAA. Artificial-intelligence analysis of your information runs on Longevity Metrics on-premises hardware; your information is not provided to third-party artificial-intelligence companies or to any external inference service.

### **Other Permitted Uses and Disclosures**

We may also use or disclose your health information as required by 45 C.F.R. Section 164.512 or other applicable law, including: to avoid a serious threat to health or safety; as required by state or federal law; for workers compensation proceedings; for public health activities; for public health oversight activities; in response to a court order or subpoena; in response to lawful law enforcement requests when accompanied by a subpoena; and for proof of immunizations to a school as required by state law.

## **2. Disclosure to Persons Involved in Your Healthcare**

Unless you instruct us otherwise, we may disclose information to a family member, relative, friend, or other person involved in your healthcare or payment for your healthcare, per your request to do so. We will limit disclosures to information relevant to that person's involvement. If you object to such disclosures at a future date, please notify the Privacy Officer in writing.

### **3. Uses and Disclosures Requiring Your Written Authorization**

For uses and disclosures not described in this Notice, we will obtain your written authorization before using or disclosing your protected health information. This includes: use or sale of your protected health information for marketing purposes; sale of your protected health information; use or disclosure of psychotherapy notes; enrollment in specific research studies not covered by the general research authorization above; and linkage to external healthcare data sharing networks.

You may revoke any authorization at any time by submitting a written notice to the Privacy Officer. Revocation will not affect actions already taken in reliance on the authorization.

### **4. Your Rights Concerning Your Protected Health Information**

To exercise any of the following rights, submit a written request to the Privacy Officer. We will respond within 30 days of receiving your request.

#### **Right to Request Restrictions**

You may request restrictions on the use or disclosure of your health information for treatment, payment, or healthcare operations. We are not required to agree to most requested restrictions, but we must agree if you request that we not disclose your information to your health plan for services you have paid for in full out of pocket.

#### **Right to Request Confidential Communications**

You may request that we contact you by alternative means or at alternative locations. We will accommodate reasonable requests.

#### **Right to Inspect and Obtain Copies**

You have the right to inspect, obtain, and will always be given copies of your health information, including electronic copies and all raw data obtained in its highest dimensional form. We will respond within 30 days. We may charge a reasonable, cost-based fee for copies. Under the 21st Century Cures Act information blocking provisions, we are prohibited from blocking your access to your health information.

#### **Right to Request Amendment**

You may request amendment of your health information. We may deny the request if we did not create the record, if the record is accurate and complete, or if the information is not subject to amendment under applicable law.

#### **Right to an Accounting of Disclosures**

You may receive an accounting of certain disclosures we have made of your protected health information during the prior six years. The first accounting in a 12-month period is free.

## **Right to a Paper Copy**

You may obtain a paper copy of this Notice at any time, even if you have agreed to receive it electronically. Digital copies can be downloaded on our website, [longevitymetrics.org](https://longevitymetrics.org), at any time.

## **Right to Withdraw Research Participation**

You may withdraw from research participation at any time without penalty and without affecting your access to clinical services. Not responding to a periodic follow-up invitation is not withdrawal, and does not end your enrollment or affect your access to services. Withdrawal from research does not require destruction of data already collected; previously collected data will be retained as required by our Ethics Board protocol and applicable law. Please note that your consent for Longevity Metrics, Inc. to access your death records after your death survives withdrawal from all other research activities and cannot be revoked by withdrawal. This is disclosed in detail in the Clinical Research Consent Form.

## **5. Our Duties**

### **Right to Notification of Breach**

You will be notified if a breach of your unsecured protected health information occurs, as required by the HIPAA Breach Notification Rule.

We are required by law to maintain the privacy of protected health information, provide you with notice of our legal duties and privacy practices with respect to health information about you, notify you of a breach of your unsecured protected health information, and abide by the terms of this Notice.

We reserve the right to change the terms of this Notice at any time and to make the revised Notice effective for all protected health information we maintain. If we materially change our privacy practices, we will post a revised Notice at our facility and on our website and make it available upon request. This Notice is reviewed annually.

## **6. Research Participants — Additional Rights and Information**

If you are enrolled in the 100-Year Human Aging Study, the Human Observatory Study, the Health Ahead Comparative Effectiveness Study, the Longevity Metrics AI/ML Development Study, or any other current or future Longevity Metrics Ethics Board-approved research study, you have additional rights and protections under federal research regulations (45 C.F.R. Part 46, the Common Rule) and your signed informed consent document. Your research participant rights include:

- The right to withdraw from the research study at any time without penalty.
- The right to receive information about the study, its risks and benefits, and how your data will be used, before you consent to participate.

- The right to have your research data protected by the Ethics Board-approved protocol.
- The right to contact the Ethics Board with questions or concerns about your research participation.
- Please note: your consent for Longevity Metrics, Inc. to access your death records after your death is permanent and survives withdrawal from all other research activities. This provision is disclosed in the Clinical Research Consent Form signed at enrollment.

Questions about your research participation should be directed to the Principal Investigator: William E. Brandenburg, MD, at [info@longevitymetrics.org](mailto:info@longevitymetrics.org) or (303) 501-0016. Questions or concerns about your rights as a research participant should be directed to the Ethics Board independently at [ethics@longevitymetrics.org](mailto:ethics@longevitymetrics.org).

Questions or concerns about your rights as a research participant may also be directed to the HHS Office for Human Research Protections (OHRP) at [ohrp.hhs.gov](http://ohrp.hhs.gov).

## 7. Changes to This Notice

We reserve the right to change the terms of this Notice at any time and to make the revised Notice effective for all protected health information we maintain. We will post the current Notice at our facility and on our website. This Notice is reviewed annually. You may obtain a copy of the current Notice from the Privacy Officer at any time.

If you believe your privacy rights have been violated, you may file a complaint with the Privacy Officer in writing at the address below or with the Secretary of Health and Human Services. We will not retaliate against you for filing a complaint. To file a complaint with HHS: U.S. Department of Health and Human Services, Office for Civil Rights, 200 Independence Avenue S.W., Washington, D.C. 20201. Online: [hhs.gov/hipaa/filing-a-complaint](http://hhs.gov/hipaa/filing-a-complaint).

## 8. Contact: Privacy Officer

Privacy Officer, Longevity Metrics, Inc. 3020 Carbon Place, Suite 101, Boulder, CO 80301 | (303) 501-0016 | [info@longevitymetrics.org](mailto:info@longevitymetrics.org)

## 9. Change Log

**October 2024:** Initial Notice of Privacy Practices published.

**December 2025:** Minor administrative updates.

**March 2026:** Substantive revision — added mortality follow-up and lifetime death record access disclosure; research participant rights updated; updated research studies and IRB references; added Health Ahead Bus as covered service location; added annual review cycle; added 21st Century Cures Act information blocking notice.

**April 2026:** Entity name updated to Longevity Metrics, Inc.; research participant rights section expanded; breach notification right added; Changes to This Notice section added; HHS complaint address added; this Change Log added.

**July 2026:** Aligned with Clinical Research Consent V2. Corrected research-participation wording to reflect that enrollment is a condition of in-person services while participation remains voluntary and withdrawable; renamed the Colorado Human Observatory to the Human Observatory Study; added the Longevity Metrics AI/ML Development Study and a future-study framework to the research and research-participant sections; noted optional death-record access for online-only participants; standardized Principal Investigator name.

**July 2026 (Rev. 2):** Aligned with Clinical Research Consent V2.1. Removed the description of Social Security Numbers and identification documents as held in a separate, local-only identity file; storage is now described as encrypted with access restricted to authorized personnel. Noted that a chest-worn camera recording an entire visit may be utilized but is not routine, and that home or workplace footage may be captured at the start of a YLRC consultation held outside a Longevity Metrics location.

**August 8, 2026 (V3):** Versioned as V3 and aligned with the Clinical Research Consent Form V3, Consent for Patient Care V3, and Unified Patient Agreement V3. Death record authorization stated as required in every pathway, with Social Security Number required in person and optional for online-only participation, and linkage tier recorded. Ethics Board contact address [ethics@longevitymetrics.org](mailto:ethics@longevitymetrics.org) added, routed to the Chair. Ethics Board naming standardized. Storage of identifiable information with cloud providers under business associate agreements stated, alongside on-premises-only artificial-intelligence analysis. Consent documents applicable to online-only participants distinguished from those applicable to in-person participants. Non-response to a follow-up invitation stated not to constitute withdrawal. Stated that Longevity Metrics retains no biological specimens. Added disclosure of derived models, risk estimates, and analytic findings provided to organizations, with patient records and datasets never transferred.

**Your signature on the Unified Patient Agreement acknowledges receipt of this Notice of Privacy Practices.**